

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

HADI MATAR

Defendant.

**NOTICE OF MOTION FOR
FOR EXTENSION OF TIME TO FILE
OMNIBUS MOTION**

Docket No.: 24-cr-59-RJA-JJM

NOTICE OF MOTION

Defendant Hadi Matar, by and through his attorney, Andrew D. Brautigam, Esq., and upon the annexed declaration of Andrew D. Brautigam, Esq., hereby moves this Court for an extension of time to file his omnibus motion to May 23, 2025, or to such other date determined by the Court, and for such other and further relief as this Court deems just and proper under the circumstances.

DATED: May 9, 2025

Respectfully Submitted

/s/ Andrew D. Brautigam

Andrew D. Brautigam, Esq.

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Counsel for Defendant Hadi Matar

TO: Tim Lynch, Esq.
U.S. Attorney's Office
138 Delaware Ave
Buffalo, NY 14202

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

DECLARATION

HADI MATAR,

Docket No.: 24-cr-59-RJA-JJM

Defendant.

**DECLARATION OF ANDREW D. BRAUTIGAM, ESQ., IN SUPPORT OF
THE DEFENDANT'S MOTION FOR AN EXTENSION OF TIME TO FILE HIS
OMNIBUS MOTION**

ANDREW D. BRAUTIGAM, ESQ., an attorney admitted to practice law in this State and District, and subject to the penalties of perjury, does hereby declare the following to be true and correct:

1. I represent the defendant, Hadi Matar.
2. Mr. Matar has been detained pending sentencing and is in the primary custody of New York State while he awaits sentencing on a matter in Chautauqua County Court. It is my understanding that Mr. Matar's case in this court had a deadline for the filing of an omnibus motion of today, May 9, 2025.
3. Mr. Matar's pending case in this Court requires the full attention of both Mr. Barone and co-counsel. Mr. Barone is currently out of the office, and I have been engaged in a jury trial in Chautauqua County Court which commenced two weeks ago and will continue into next week.

4. I discussed this matter with Mr. Lynch earlier this week, and it is my understanding that he does not object to a brief extension of Defendant's deadline to file his omnibus motion, as Mr. Lynch is currently engaged (or is about to be engaged) in a trial.

5. Defendant and Defense Counsel waive any speedy trial time associated with the requested adjournment, as the delay benefits Mr. Matar and allows Mr. Barone and newly engaged co-counsel time to prepare an omnibus motion in this matter.

WHEREFORE, Defendant Hadi Matar requests an extension of time to file his sentencing memorandum, adjournment of sentencing to any date on or after May 23, 2025, and for any other relief the Court finds just and proper.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 9, 2025, Fredonia, New York.

Respectfully submitted,

/s/ Andrew D. Brautigam

Andrew D. Brautigam, Esq.

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Counsel for Defendant Hadi Matar

TO: Tim Lynch
Assistant United States Attorney